IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA PITTSBURGH DIVISION

WENDELL H. STONE COMPANY, INC. d/b/a STONE & COMPANY, individually and on behalf of all others similarly situated,

Case No. 2:18-cv-01135-AJS

Plaintiff,

V.

PC SHIELD INC., an Oklahoma corporation,

Defendant.

PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT

Plaintiff Wendell H. Stone Company, Inc. d/b/a Stone & Company ("Plaintiff" or "Stone") hereby respectfully moves to have this Court enter default against Defendant PC Shield, Inc. ("Defendant" or "PC Shield"). Entry of Default is proposed against Defendant PC Shield because it has failed to answer or otherwise respond to Plaintiff's Class Action Complaint.

Defendant PC Shield was served on September 22, 2018 and to date has not responded.

The Affidavit of Default, attached hereto as Exhibit A, further supports this request.

Respectfully,

Dated: October 29, 2018 STONE & COMPANY, INC., individually, and on behalf of all others similarly situated,

/s/ Patrick H. Peluso
One of Plaintiff's Attorneys

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Counsel for Plaintiff and the Putative Class

^{*}pro hac vice admission

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the above titled document was served upon counsel of record by filing such papers via the Court's ECF system on October 29, 2018.

/s/ Patrick H. Peluso